

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Mary Teager

and

Carrie Teager,

Plaintiffs,

v.

Fidelis Recovery Management, LLC
c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604,

Defendant.

Case No.

**COMPLAINT FOR VIOLATIONS OF
THE FAIR DEBT COLLECTION
PRACTICES ACT**

Jury Demand Included

Now come Plaintiffs, by and through their attorneys, and for their Complaint, allege as follows:

JURISDICTION AND VENUE

- 1- Plaintiffs bring this action for damages, and other legal and equitable remedies, resulting from the illegal actions of Defendants practices under the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. (öFDCPAö).
- 2- This Court has jurisdiction under 28 U.S.C. §1331 (general federal question), §1337, 15 U.S.C. § 1692k(d) (FDCPA).
- 3- Venue in this District is proper because defendant transacts business here.

PARTIES

- 4- Plaintiffs incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the öDebtö).
- 5- Plaintiffs are residents of the State of the Illinois.

- 6- Unless otherwise specified, the term "Plaintiff," as used herein, shall refer collectively to Plaintiffs Mary Teager and Carrie Teager.
- 7- Defendant is a business entity with its principal office in the State of Georgia.
- 8- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 9- Defendant regularly attempts to collect, or attempts to collect, debts owed or due another.
- 10- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.
- 11- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.

FACTS

- 12- Between February and April 2014, Defendant called Plaintiff several times to collect the Debt.
- 13- During several of these communications, Defendant failed to identify itself as a debt collector as required under the FDCPA.
- 14- Defendant damaged Plaintiff.
- 15- Defendant violated the FDCPA.

COUNT I

- 16- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 17- Defendant violated 15 USC § 1692e(11) by failing to identify itself as a debt collector.

COUNT II

- 18- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 19- Defendant violated 15 USC § 1692e(10) by using false representation or deceptive means to collect a debt.

COUNT III

20- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

21- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, a debt.

JURY DEMAND

22- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

23- Plaintiff prays for the following relief:

- a- Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b- Judgment against Defendant for \$2,000 in statutory damages (\$1,000 for each Plaintiff) for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c- Judgment against Defendant for Plaintiff's reasonable attorney's fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d- Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

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